

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON

MIROSLAVA LEWIS,

Plaintiff,

v.

VAIL RESORTS, INC., VAIL  
HOLDINGS, INC., THE VAIL  
CORPORATION, and JOHN DOES 1-3,

Defendants.

No. 2:23-cv-00812-RSL

STIPULATED MOTION AND ORDER  
TO EXTEND DEADLINE TO FILE  
REPLY IN SUPPORT OF VAIL  
DEFENDANTS; MOTION FOR  
SUMMARY JUDGMENT

**I. STIPULATION**

For good cause shown pursuant to Fed. R. Civ. P. 16(b)(4) and United States District Court for the Western District of Washington Local Civil Rule (LCR) 7(j) and 16(b)(6), defendants Vail Resorts, Inc., Vail Holdings, Inc., and the Vail Corporation (collectively “Defendants”) and Plaintiff Miroslava Lewis respectfully and jointly move for entry of an order extending the deadline for Defendants to file their reply in support of their motion for summary judgment, (Dkt. #74), to January 9, 2025.

A court may modify the deadlines in a case schedule or for a summary judgment motion for good cause. Fed. R. Civ. P. 16(b)(4); LCR 7(j); LCR 16(b)(5), (6). This standard primarily considers the diligence of a party seeking the amendment. *Johnson v. Mammoth Recreations*, 975 F.2d 604, 609 (9th Cir. 1992). Counsel for the parties have been working cooperatively to adjust filing deadlines related to Defendants’ motion for summary judgment and agree that good cause exists for a 3-day extension of the deadline for Defendants to file

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KEATING, BUCKLIN & MCCORMACK, INC., P.S.

ATTORNEYS AT LAW  
1201 THIRD AVENUE, SUITE 1580  
SEATTLE, WASHINGTON 98101  
PHONE: (206) 623-8861  
FAX: (206) 223-9423

1 the reply in support of their motion for summary judgment:

2 1. Defendants filed their motion for summary judgment on December 3, 2024.  
3 (Dkt. # 74.) Plaintiff's response was due by December 26, with Defendants' reply due by  
4 December 31. *See* LCR 7(c)(4).

5 2. On December 23, Plaintiff filed an unopposed motion to extend the deadline  
6 for her summary judgment response by 5 days to December 31. (Dkt. #78.) The Court granted  
7 the motion. (Dkt. #79.) Plaintiff filed her response on December 31. (Dkt. #81.)

8 3. Counsel for the parties' conferred and agreed that good cause exists for a  
9 similar short extension for Defendants to file their reply in support of summary judgment  
10 given the holidays, Plaintiff's short deadline extension, Defendants' non-opposition to  
11 Plaintiff's request for an extension, and the lack of prejudice to any party by these short  
12 extensions.

13 Given the above, the parties stipulate the good cause exists to extend the deadline for  
14 Defendants to file their reply in support of their pending motion for summary judgment by  
15 three days to January 9, 2025.

16 IT IS SO STIPULATED THROUGH COUNSEL OF RECORD

17  
18 DATED: January 3, 2025

19 KEATING, BUCKLIN & McCORMACK, INC., P.S.

20  
21 By: /s/ Richard B. Jolley

22 Richard B. Jolley, WSBA #23473

23 Brian C. Augenthaler, WSBA #44022

24 Margot G. Cotter, WSBA #57540

25 Rakiah B. Adams, WSBA #58799

26 Attorneys for Defendants

27 1201 Third Avenue, Suite 1580

Seattle, WA 98101

Phone: (206) 623-8861

Fax: (206) 223-9423

Email: [rjolley@kbmlawyers.com](mailto:rjolley@kbmlawyers.com)

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KEATING, BUCKLIN & McCORMACK, INC., P.S.

ATTORNEYS AT LAW  
1201 THIRD AVENUE, SUITE 1580  
SEATTLE, WASHINGTON 98101  
PHONE: (206) 623-8861  
FAX: (206) 223-9423

baugenthaler@kbmlawyers.com  
mcotter@kbmlawyers.com  
radams@kbmlawyers.com

I certify that this memorandum contains 351 words, in compliance with the Local Civil Rules.

DATED: January 3, 2025

SALTZ MONGELUZZI BENDESKY, PC.

By: /s/ Robert W. Zimmerman

Robert W. Zimmerman (pro hac vice) PA# 208410  
Samuel A. Haaz (pro hac vice) PA# 21505  
Attorneys for Plaintiff

1650 Market Street, 52nd Floor  
Philadelphia, PA 19103  
Phone: (215) 575-3898  
Email: rzimmerman@smbb.com  
shaaz@smbb.com

DATED: January 3, 2025

DEBORAH ALEXANDER ATTORNEY AT LAW  
PLLC

By: /s/ Deborah E. Alexander

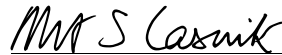
Deborah Emanuel Alexander, WSBA #21505  
Attorney for Plaintiff

11900 NE 1st Street, Suite 300  
Bellevue, WA 98005  
Phone: (206) 403-3426  
Email: dalexander@alexanderlawoffice.com

**II. ORDER**

THIS MATTER having come on regularly for hearing upon the stipulation of the parties and the Court being fully advised in the premises, now, therefore, it is hereby ORDERED that the deadline for Defendants to file their reply in support of their motion for summary judgment, (Dkt. #74), is continued to January 9, 2025.

Dated this 3rd day of January, 2025.



Robert S. Lasnik  
United States District Judge